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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

PHILIP J. FAGAN, JR., an individual,  
and as Trustee of the PHILIP J.  
FAGAN, JR. 2001 TRUST  
Plaintiff,

v.

FIRST AMERICAN TITLE INSURANCE  
COMPANY; and Does I-X, inclusive,  
Defendants

Case No.: 2:23-cv-00371-RFB-DJA

**STIPULATION & ORDER TO  
EXTEND TIME TO FILE  
OPPOSITION TO MOTION TO  
DISMISS [DKT. NO 9]  
(FIRST REQUEST)**

Plaintiff, Philip J. Fagan, Jr., individually and as trustee of the Philip J. Fagan, Jr. 2001 Trust, ("Plaintiff") and Defendant, First American Title Insurance Company ("Defendant") (collectively, the "Parties"), by and through their respective attorneys of record, hereby stipulate and agree as follows:

1. On March 15, 2023, Plaintiff served Defendant with the Summons and Complaint.
2. On April 13, 2023, Defendant filed a Motion to Dismiss asserting, *inter alia*, the application of the litigation privilege and the Rooker-Feldman abstention doctrine, Docket Entry No. 9.
3. Plaintiff requests a brief extension of time to respond to the Motion to Dismiss.

1           4.       This extension is requested to allow counsel for Plaintiff additional time to review  
2 the points and authorities contained in the motion and to provide a detailed response, Plaintiff's  
3 office is currently engaged in a 3-week Jury Trial which has limited the time available to fully  
4 research the points raised by Defendant.

5           5.       Accordingly, Plaintiff requests a brief extension through May 4, 2023, to respond  
6 to the Complaint.

7           6.       Counsel for Defendant does not oppose the requested extension.

8           7.       This is the first request for an extension which is brought in good faith and not for  
9 purposes of delay.

10           DATED this 27th day of April, 2023.

11           DATED this 27th day of April, 2023.

12           **MAURICE WOOD**

13           **BLACK & WADHAMS**

14           By: /s/ Brittany Wood

15           By: /s/ Allison R. Schmidt

16           AARON R. MAURICE, ESQ.

17           ALLISON R. SCHMIDT, ESQ.

18           Nevada Bar No. 006412

19           Nevada Bar No. 10743

20           BRITTANY WOOD, ESQ.

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22           Nevada Bar No. 007562

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24           AMANDA K. BAKER, ESQ.

25           *Attorneys for Plaintiff*

26           Nevada Bar No. 15172

27           8750 W. Charleston Blvd., Ste. 100

28           Las Vegas, Nevada 89117

*Attorneys for Defendant*

IT IS SO ORDERED.



RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 28th day of April, 2023.